1	BRIAN W. BOSCHEE, ESQ. (NBN 07612) Email: bboschee@nevadafirm.com JAMES D. BOYLE, ESQ. (NBN 08384)				
2	Email: jboyle@nevadafirm.com				
3	JOANNA M. MYERS, ESQ. (NBN 12048) Email: jmyers@nevadafirm.com				
4	HOLLEY DRIGGS WALCH FINE WRAY PUZEY & THOMPSON				
5	400 South Fourth Street, Third Floor Las Vegas, Nevada 89101				
6 7	Telephone: 702/791-0308 Facsimile: 702/791-1912				
	HARRY W. LIPMAN, ESQ. (PHV forthcoming)				
8	hlipman@rlrpclaw.com RICHARD E. ROSBERGER, ESQ. (PHV forthco	ming)			
9	Email: rrosberger@rlrpclaw.com ROTTENBERG LIPMAN RICH, P.C.				
10	230 Park Avenue, 18 th Floor New York, New York 10169				
11	Telephone: 212/661-3080 Facsimile: 212/867-1914	Telephone: 212/661-3080			
12	Attorneys for Plaintiffs				
13	UNITED STATES D	UNITED STATES DISTRICT COURT			
14					
15					
16	limited liability company; and GINKGO LLC, a Nevada limited liability company,	CASE NO.: 3:18-cv-00395-RCJ-WGC			
17	Plaintiffs,	PLAINTIFFS' UNOPPOSED MOTION			
18	v.	TO EXCEED PAGE LIMITS			
19	LIANG YU, an individual,				
20					
21	Pursuant to LR II 7-3(c), Plaintiffs Zitan Technologies LLC ("Zitan") and Ginkgo LLC				
22	("Ginkgo") (collectively, "Plaintiffs"), by and	through their undersigned attorneys, hereby			
23	respectfully submit this Motion to Exceed Page	ge Limits with regard to Plaintiffs' Reply to			
24	Defendant's Opposition to Plaintiffs' Motion for	Temporary Restraining Order and Preliminary			
25	Injunction (the "Reply"), and hereby request that	at this Court enter an order granting Plaintiffs'			
26	leave to file four (4) pages in excess of the twelve	e (12) page limit for replies as set forth in LR II			
27		DISTRICT OF NEVADA ECHNOLOGIES, LLC, a Nevada ability company; and GINKGO LLC, a mited liability company, Plaintiffs, PLAINTIFFS' UNOPPOSED MOTION TO EXCEED PAGE LIMITS PU, an individual, Defendant.			
28	(-)	, , , , , , , , , , , , , , , , , , , ,			

exceed the page limit. *See* Declaration of James D. Boyle Esq. In Support of Plaintiffs' Motion to Exceed Page Limitation attached hereto as Exhibit A ("Boyle Decl.").

Good cause exists to extend the page limitation set forth in LR II 7-3(b) because: (1) the factual background pertinent to Plaintiff's Motion for Temporary Restraining Order and Preliminary Injunction (ECF Nos. 14 and 15 (the "Motion")) involves complex claims of misappropriation of trade secrets under the federal Defense of Trade Secrets Act and Nevada's Uniform Trade Secrets Act, and breach of contract. Boyle Decl., at ¶ 2(a). Each of these claims raises extensive factual and legal issues, which must be analyzed through the requirements for obtaining injunctive relief under statutory provisions and case law precedent, all of which Plaintiffs are compelled to address in detail. Boyle Decl., at ¶ 2(b). In his opposition brief, Mr. Yu raises numerous factual and legal issues which were not addressed in the underlying motion, all of which Plaintiffs must address and refute. Boyle Decl., at ¶ 2(c). Thus, including introductory and conclusion language, as well as the caption and signature block, Plaintiffs' Reply includes four (4) pages in addition to the permissible twelve (12) pages allowed by LR II 7-3(b), for a total of sixteen (16) pages. Boyle Decl., at ¶ 2(d).

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1	Accordingly, the Plaintiffs respectfully request that this Court extend the permissible		
2	page limit for the Reply to up to sixteen (16) pages.		
3	DATED this 17 th day of September, 2018.		
4	HOLLEY DRIGGS WALCH		
5	FINE WRAY PUZEY & THOMPSON		
6	/s/ James D. Boyle BRIAN W. BOSCHEE, ESQ. (NBN 07612)		
7	JAMES D. BOYLE, ESQ. (NBN 08384) JOANNA M. MYERS, ESQ. (NBN 12048)		
8	400 South Fourth Street, Third Floor Las Vegas, Nevada 89101		
9	ROTTENBERG LIPMAN RICH, P.C.		
10			
11	HARRY W. LIPMAN, ESQ. RICHARD E. ROSBERGER, ESQ. 230 Park Avenue, 18 th Floor		
12	New York, New York 10169		
13	Attorneys for Plaintiffs		
14			
15	IT IS SO ORDERED:		
16	E. Janes		
17	UNISTED STATES DISTRICT JUDGE/ UNITED STATES MAGISTRATE JUDGE		
18	Dated: _ September 25, 2018		
19	Dated: _ Copiestics = 20, 2010		
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21			
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CERTIFICATE OF SERVICE

Pursuant to FRCP 5(b), I certify that on the 17th day of September, 2018, I caused the document entitled **PLAINTIFFS' UNOPPOSED MOTION TO EXCEED PAGE LIMITS**, to be served as follows:

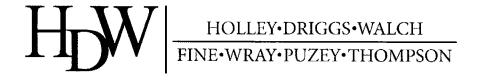
Attorneys of Record	Parties Represented	Method of Service
Leigh Goddard, Esq. Laura Jacobsen, Esq. McDONALD CARANO LLP 100 West Liberty Street, 10 th Floor Reno, Nevada 89501	Defendant Liang Yu	□ Personal Service ■ Email/E-File □ Fax Service □ Mail Service
Edwin K. Prather, Esq. Sybil L. Renick, Esq. PRATHER LAW OFFICES 245 Fifth Street, Suite 103 San Francisco, California 94103	Attorneys for Defendant Liang Yu	□ Personal Service ■ Email/E-File □ Fax Service ■ Mail Service

An employee of Holley D

An employee of Holley Driggs Walch Fine Wray Puzey & Thompson

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EXHIBIT A



1	BRIAN W. BOSCHEE, ESQ. (NBN 07612)			
2	Email: bboschee@nevadafirm.com JAMES D. BOYLE, ESQ. (NBN 08384)			
3	Email: jboyle@nevadafirm.com JOANNA M. MYERS, ESQ. (NBN 12048)			
4	Email: jmyers@nevadafirm.com HOLLEY DRIGGS WALCH			
5	FINE WRAY PUZEY & THOMPSON 400 South Fourth Street, Third Floor			
6	Las Vegas, Nevada 89101 Telephone: 702/791-0308			
7	Facsimile: 702/791-1912			
8	HARRY W. LIPMAN, ESQ. (PHV forthcoming) hlipman@rlrpclaw.com			
	RICHARD E. ROSBERGER, ESQ. (PHV forthcoming)			
9	Email: rrosberger@rlrpclaw.com ROTTENBERG LIPMAN RICH, P.C.			
10	230 Park Avenue, 18 th Floor New York, New York 10169			
11	Telephone: 212/661-3080 Facsimile: 212/867-1914			
12	Attorneys for Plaintiffs			
13	UNITED STATES DISTRICT COURT			
14	DISTRICT OF NEVADA			
15		NEVADA		
16	ZITAN TECHNOLOGIES, LLC, a Nevada limited liability company; and GINKGO LLC, a Nevada limited liability company,	CASE NO.: 3:18-cv-00395-RJC-WGC		
17	Plaintiffs,	DECLARATION OF JAMES D.		
18	v.	BOYLE ESQ. IN SUPPORT OF PLAINTIFFS' UNOPPOSED MOTION		
19	LIANG YU, an individual,	TO EXCEED PAGE LIMITATION		
20	D. C. 1			
21	Defendant.			
	Defendant. L. James D. Boyle, Esq., hereby state and o	leclare as follows:		
22	I, James D. Boyle, Esq., hereby state and o			
22 23	I, James D. Boyle, Esq., hereby state and o	riggs Walch Fine Wray Puzey & Thompson,		
	I, James D. Boyle, Esq., hereby state and on a shareholder with Holley Draws and am one of the attorneys representing Plaintiff	riggs Walch Fine Wray Puzey & Thompson, S Zitan Technologies, LLC and Ginkgo LLC		
23	I, James D. Boyle, Esq., hereby state and of the attorneys representing Plaintiff (collectively, "Plaintiffs') in this matter. I make	riggs Walch Fine Wray Puzey & Thompson, is Zitan Technologies, LLC and Ginkgo LLC te this declaration in support of Plaintiffs'		
23 24	I, James D. Boyle, Esq., hereby state and on a shareholder with Holley Draws and am one of the attorneys representing Plaintiff	riggs Walch Fine Wray Puzey & Thompson, is Zitan Technologies, LLC and Ginkgo LLC te this declaration in support of Plaintiffs'		
23 24 25	I, James D. Boyle, Esq., hereby state and of the attorneys representing Plaintiff (collectively, "Plaintiffs') in this matter. I make	riggs Walch Fine Wray Puzey & Thompson, is Zitan Technologies, LLC and Ginkgo LLC te this declaration in support of Plaintiffs' ntiffs request this Court's leave to exceed the		
23242526	I, James D. Boyle, Esq., hereby state and of the attorneys representing Plaintiff (collectively, "Plaintiffs') in this matter. I make Motion to Exceed Page Limitations, wherein Plain	riggs Walch Fine Wray Puzey & Thompson, is Zitan Technologies, LLC and Ginkgo LLC are this declaration in support of Plaintiffs' ntiffs request this Court's leave to exceed the with regard to Plaintiffs' Reply In Support of		

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- 2. Good cause exists to exceed the page limit with regard to the Reply Brief for the following reasons:
- a. Plaintiffs' Motion for Temporary Restraining Order and Preliminary Injunction (ECF Nos. 14 and 15 (the "Motion")) involves an evaluation of complex claims regarding misappropriation of trade secrets under the federal Defense of Trade Secrets Act and Nevada's Uniform Trade Secrets Act, and breach of contract;
- b. Each of these claims raises extensive factual issues, which must be evaluated through the legal requirements for obtaining injunctive relief under controlling statutory allowances and case law precedent, all of which Plaintiffs are compelled to address in detail.
- c. Defendant Liang Yu's ("Mr. Yu") Opposition to the Motion addresses multiple factual disputes and legal arguments which were not raised in the Motion. In this regard, Plaintiffs must address and refute the factual disputes and legal arguments raised by Mr. Yu, and provide analysis of these matters through the statutory provisions and case law precedent for obtaining injunctive relief.
- d. Including introduction and conclusion language, and the caption and signature block, Plaintiffs' Reply Brief is sixteen (16) pages in length and exceeds the allowable page limitation by four (4) pages. Plaintiffs respectfully suggest that the additional four pages of the Reply Brief are necessary and valuable to the Court's ultimate analysis of the Motion and the issues presented therein.
- 3. On September 17, 2018, I received an email from counsel for Mr. Yu stating that Mr. Yu has no objection to Plaintiffs' request to exceed the page limit. *See* Email from L. Goddard dated September 17, 2018 attached hereto as Exhibit A-1.

I hereby declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

DATED this 17th day of September, 2018, at Las Vegas, Nevada.

JAMES D. BOYLE, ESQ.

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EXHIBIT 1



Joanna Myers

From:

Leigh T. Goddard < lgoddard@mcdonaldcarano.com>

Sent:

Monday, September 17, 2018 11:05 AM

To:

Joanna Myers; Laura Jacobsen

Cc:

Jim Boyle; Brian Boschee; sybil; Edwin Prather

Subject:

RE: Zitan/Ginkgo - Motion to Exceed Page Limits

We have no objection to your request to exceed the page limit in reply.

Leigh Goddard | Partner

McDONALD CARANO

P: 775.788.2000 | E: lgoddard@mcdonaldcarano.com

From: Joanna Myers <jmyers@nevadafirm.com> Sent: Monday, September 17, 2018 10:30 AM

To: Leigh T. Goddard < lgoddard@mcdonaldcarano.com>; Laura Jacobsen < ljacobsen@mcdonaldcarano.com>

Cc: Jim Boyle <iboyle@nevadafirm.com>; Brian Boschee <bboschee@nevadafirm.com>

Subject: Zitan/Ginkgo - Motion to Exceed Page Limits

Good morning Leigh and Laura,

As a follow up to my message with your assistant, I wanted to reach out and let you know we are filing a motion to exceed the page limit for our reply (by 4 pages). Please let us know if we can indicate your consent.

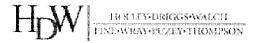
We are reviewing your edits to the Protective Order and should have it back to you shortly.

Kind regards,

Joanna

Joanna Myers

Attorney Las Vegas Office



Tel: 702.791.0308 | Fax: 702.791.1912 400 S. 4th Street, Suite 300, Las Vegas NV 89101 Tel: 775.851.8700 | Fax: 775.851.7681 800 S. Meadows Parkway, Suite 800, Reno NV 89521

www.nevadafirm.com

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